

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF OKLAHOMA**

(1) MARTHA DONELSON and)
 (2) JOHN FRIEND,)
)
 Plaintiff,)

vs.)

Case No. 14-CV-316-JHP-TLW

(1) UNITED STATES OF AMERICA;)
 DEPARTMENT OF INTERIO;)
 BUREAU OF INDIAN AFFAIRS;)
 (2) DEVON ENERGY PRODUCTION)
 COMPANY, L.P)
 (3) CHAPARRAL ENERGY, LLC)
 (4) ENCANAN OIL & GAS (USA),)
 INC.)
 (5) PERFORMANCE ENERGY)
 RESOURCES, LLC)
 (6) CEJA CORPORATION)
 (7) CEP MID-CONTINENT, LLC)
 (8) LINN ENERGY HOLDINGS, LLC)
 (9) SULLIVAN & COMPANY, LLC)
 (10) CARDINAL RIVER ENERGY, LP)
 (11) REVARD OIL & GAS)
 PROPERTIES, INC.)
 (12) BLACK LAVA RESOURCES, LLC)
 (13) B&G OIL COMPANY)
 (14) ORION EXPLORATION, LLC)
 (15) NADEL AND GUSSMAN, LLC)
 (16) LAMAMCO DRILLING, LLC)
 (17) CLEAR MOUNTAIN)
 PRODUCTION, LLC)
 (18) SHORT OIL, LLC)
 (19) WELLCO ENERGY, INC.)
 (20) RAM ENERGY RESOURCES, INC)
 (21) MARCO OIL COMPANY, LLC)
 (22) BGI RESOURCES, LLC)
 (23) HALCON RESOURCES CORP.)
 (24) THE LINK OIL COMPANY)
 (25) OSAGE ENERGY RESOURCES)
 (26) TOOMEY OIL COMPANY, INC.)

(27) KAISER-FRANCIS ANADARKO)
 (28) HELMER OIL CORP.)
 (29) SPYGLASS ENERGY GROUP.)
 LLC;)
 AND ALL OTHER LESSEES AND)
 OPERATORS AND OPERATORS)
 WHO HAVE OBTAINED A)
 CONCESSION AGREEMENT,)
 LEASE OR DRILLING PERMIT)
 APPROVED BY THE BIA IN)
 OSAGE COUNTY IN)
 VIOLATION OF NEPA,)
)
 Defendants.)

MOTION TO DISMISS OF DEFENDANT LAMAMCO DRILLINC, LLC

COMES NOW the Defendant Lamamco Drilling LLC, (“Lamamco”) and pursuant to Fed. R. Civ. P. 12(b)(1), (6), and (7) , hereby moves to dismiss all claims asserted by Plaintiffs. In the interest of judicial economy and efficiency, Lamamco adopts and incorporates the arguments and authorities in the following motions to dismiss filed by other Defendants:

1. Defendants Devon Energy Production Co., L.P. and Linn Energy Holdings, LLC’s Motion to Dismiss and Brief in Support (Dkt. No. 136);
2. Motion to Dismiss and Brief in Support submitted by Defendants Performance Energy Resources, LLC, Short Oil, LLC, Marco Oil Company, LLC, Osage Energy Resources, LLC, Helmer Oil, Corp., and Clear Mountain Production, LLC (Dkt. No. 138).;
3. Defendants The Link Oil Company and Toomey Oil Company, Inc.’s Motion to Dismiss and Brief in Support Thereof (Dkt. No. 137) and

4. Motion to Dismiss Plaintiffs' First Amended Complaint and Brief in Support of Individual Defendants' Motion to Dismiss filed by Defendants B&G Oil Company and Wellco Energy, Inc. (Dkt. No. 124).

WHEREFORE, Lamamco requests the Court dismiss Plaintiffs' First Amended Complaint with prejudice, award it its costs and attorneys' fees and grant such additional relief as the Court deems just and equitable.

Respectfully Submitted,

JONES, GOTCHER & BOGAN, P.C.

/s/ C. Michael Copeland
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Lamamco Drilling LLC

CERTIFICATE OF SERVICE

The undersigned does hereby certify that on the 7th day of October, 2014, I electronically transmitted the attached document to the Clerk of Court using the ECF System for filing. Based on the records currently on file, the Clerk of Court will transmit a Notice of Electronic Filing to the applicable ECF registrants.

/s/ C. Michael Copeland